

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN) .

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Caggiano, Elizabeth	NY	USA	Opperman, Michael	Child	N/A
2	Cruikshank, Marianne	NY	USA	Cruikshank, Robert	Spouse	N/A
3	Francolini, Carol	NY	USA	Jones III, Arthur J.	Spouse	N/A
4	Francolini, Carol	NY	USA	Jones III, Arthur J.	Parent and legal guardian on behalf of J.J., minor child of 9/11 Decedent Arthur J. Jones III	N/A
5	Haynes, Ann R.	NY	USA	Haynes, William W.	Spouse	N/A
6	Haynes, Ann R.	NY	USA	Haynes, William W.	Personal Representative of the Estate of Elizabeth W. Haynes, deceased	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					Child of 9/11 Decedent William W. Haynes	
7	Haynes, II, William W.	NY	USA	Haynes, William W.	Child	N/A
8	Jones, Cary	NY	USA	Jones III, Arthur J.	Child	N/A
9	Jones, Charlotte	NY	USA	Jones III, Arthur J.	Child	N/A
10	Jones, Julia	NY	USA	Jones III, Arthur J.	Child	N/A
11	Morell, Jr., George W.	NY	USA	Morell, George W.	Child	N/A
12	Morell, Kelsey Jane	MN	USA	Morell, George W.	Child	N/A
13	Morell, Nancy J.	NY	USA	Morell, George W.	Child	N/A
14	Morell, Patricia	NY	USA	Morell, George W.	Personal Representative of the Estate of Gaspar John Morell, Jr., deceased Sibling of 9/11 Decedent George W. Morell	N/A
15	Morell, Roberta	NY	USA	Morell, George W.	Spouse	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
16	Morrison, Laura	NY	USA	Siskopoulos, Muriel	Personal Representative of the Estate of Mark Siskopoulos, deceased Spouse of 9/11 Decedent Muriel Siskopoulos	N/A
17	O'Neil Morell, Harrison	NY	USA	Morell, George W.	Child	N/A
18	Oliva Moss, Elizabeth	NY	USA	Oliva, Linda	Parent	N/A
19	Opperman, Deborah	NY	USA	Opperman, Michael	Spouse	N/A
20	Opperman, Jr., Michael	VT	USA	Opperman, Michael	Child	N/A
21	Rosenblatt, Philip	NY	USA	Siskopoulos, Muriel	Personal Representative of the Estate of Anne Rosenblatt Klein, deceased Parent of 9/11 Decedent Muriel Siskopoulos	N/A
22	Smith, Jr., Terence M.	NY	USA	Haynes, William W.	Child	N/A
23	Stan, Daniel	NY	USA	Stan, Alexandru	Personal Representative	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					of the Estate of Elisabeta Stan, deceased Parent of 9/11 Decedent Alexandru Stan	
24	Stan, Daniel	NY	USA	Stan, Alexandru	Personal Representative of the Estate of Constantin Stan, deceased Parent of 9/11 Decedent Alexandru Stan	N/A
25	Yeow, Evelyn Siew-Sim	NY	USA	Waye, Michael H.	Spouse	N/A

Dated: November 20, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

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